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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION
18

19 DONALD R. CAMERON, et al.,

20 Plaintiffs,

21 v.

22 APPLE INC.

23 Defendant.
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No. 4:11-cv-03074-YGR (TSH)

DECLARATION OF STEVE W. BERMAN
IN SUPPORT OF DEVELOPER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL

Hon. Yvonne Gonzalez Rogers

1 I, Steve W. Berman, declare:

2 1. I am the managing partner of the law firm Hagens Berman Sobol Shapiro LLP,
3 attorneys for plaintiffs and Interim Counsel appointed by the Court in the above-captioned action.
4 Based on personal knowledge or discussions with counsel in my firm of the matters stated herein, if
5 called upon, I could and would competently testify thereto.

6 2. I submit this declaration pursuant to Civil Local Rules 7-11 and 79-5(d)-(e) and in
7 connection with Developer Plaintiffs' Administrative Motion to File Under Seal the following
8 document: Declaration of Professor Nicholas Economides.

9 3. The foregoing document incorporates information and analyses derived from
10 discovery material that Defendant Apple designated "Confidential" or "Highly Confidential –
11 Attorneys' Eyes Only." Apple has requested that Developer Plaintiffs file the entire document under
12 seal, subject to Apple identifying pursuant to Local Rule 79-5(e)(1) the material it believes should
13 remain under seal. Developer Plaintiffs do not believe Apple has identified good cause to seal any
14 portion of Professor Economides's Declaration. Rather, the entire document should be available
15 both for the public and Settlement Class.

16
17 I declare under penalty of perjury under the laws of the United States that the foregoing is
18 true and correct. Executed this 26th day of August 2021, at Seattle, Washington.

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20 s/ Steve W. Berman
21 STEVE W. BERMAN
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